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In Pro Per

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES

TODD MICHAEL SCHULTZ

v.

MICHAEL C. THOMPSON
GREGORY R. HOLMES
YOUTUBE LLC

2:23-CV-03452-JAK-MRWx
Honorable Judge Michael R. Wilner

PLAINTIFF'S REQUEST
FOR ADMISSIONS, SET
ONE

I, Todd Michael Schultz (onward "Plaintiff") acting in a pro se capacity, request that YouTube LLC (Onward Youtube) make the following admissions or denials pursuant to California Code of Civil Procedure §2033.020(b) and that said answers be signed, verified, and served within 30 days after service is made upon Youtube or as early as the court may require.

Definitions

A. "Youtube", "YOU" and "YOUR" shall refer to defendant YouTube LLC.

B. "Plaintiff" shall refer to Plaintiff acting in a pro se capacity, Todd Michael Schultz.

C. "Thompson" shall refer to defendant Michael C. Thompson.

D. "Holmes" shall refer to defendant Gregory R. Holmes.

E. "HL Channel" shall refer to what has been called the "Hollywood Laughingstock" channel mentioned in the COMPLAINT.

REQUESTS FOR ADMISSION

Request for Admission No. 1

Admit that you are familiar with the HL Channel and that it belongs to Thompson.

Request for Admission No. 2

Admit that you understand that HL Channel uses, and has used since February 2021, copyrighted material belonging to Plaintiff.

Request for Admission No. 3

Admit that you understand HL Channel is meant to deride or otherwise harm the reputation of Plaintiff.

Request for Admission No. 4

Admit that you understand HL Channel is meant to harass and induce emotional distress in Plaintiff.

Request for Admission No. 5

Admit that you are negligent in upholding your Terms of Service, as it relates to protecting the civil rights and user rights of Plaintiff.

Request for Admission No. 6

Admit that you are aware of Thompson's "Parking Lot Creeper" Channel and the nature of its content.

Request for Admission No. 7

Admit that malicious harassment designed to inflict emotional distress on a person is against your Terms of Service.

Request for Admission No. 8

Admit or deny that human moderators reviewed and responded to "Channel Reports" in 2021 regarding HL Channel.

1 Request for Admission No. 9

2
3 Admit that there is no due warning about PATHOLOGICAL ABUSE
4 in Livestream Set Up windows.

5 Request for Admission No. 10

6 Admit or deny that PATHOLOGICAL ABUSE and HARASSMENT
7 is a significant problem across the Youtube platform.

8 Request for Admission No. 11

9 Admit that tools available to Livestreamers are not adequate
10 tools to prevent, address or enforce harassment policies of your
11 platform.

12 Request for Admission No. 12

13 Admit or deny that Thompson's content violates Youtube's Terms of
14 Service.

15 Request for Admission No. 13

16 Admit that "Channel Reports" as opposed to specific video "reports"
17 are not logged in the "Report Log" section of Youtube's interface.

18 Request for Admission No. 14

19 Admit that you are incapable of upholding your Terms of Service as
20 it concerns and/ or relates to all content being uploaded on Youtube.

21 Request for Admission No. 15

22 Admit that HL Channel remains published on your platform with your
23 explicit knowledge and consent.

24 Request for Admission No. 16

25
26 Admit that you are aware that Thompson harasses and maliciously
27 insults, as well as cyberstalks various individuals on your site to this
28 day.

1 Request for Admission No. 17

2
3 Admit that you believe HL Channel does not violate your
4 Terms of Service.

5 Request for Admission No. 18

6 Admit that a warning could easily be made available about
7 PATHOLOGICAL ABUSE and HARASSMENT on your platform.

8 Request for Admission No. 19

9 Admit that users that have been banned, or otherwise prohibited
10 from accessing their Youtube accounts can and often circumvent
11 any such ban by simply creating a new Username or Channel on
12 your platform whether or not this necessitates a VPN.

13 Request for Admission No. 20

14
15 Admit that machine learning or Artificial Intelligence (onward
16 "Bots") are trained and instructed to represent specific groups over
17 others.

18 Request for Admission No. 21

19 Admit that you do not believe HL Channel constitutes harassment of
20 Plaintiff.

21 Request for Admission No. 22

22 Admit that Youtube avoids enforcing reports of harassment
23 regularly

24
25 Request for Admission No. 23

26 Admit that Plaintiff is not responsible for the conduct of Thompson on
27 your platform.
28

1 Request for Admission No. 24

2 Admit that there were no possible options for Plaintiff to have the
3 aforementioned harassing conduct be addressed, and stopped once it
4 began.

5 Request for Admission No. 25

6 Admit that significant harm was sustained by Plaintiff as a result of
7 using of Youtube.

8 Request for Admission No. 26

9 Admit that Thompson's "Parking Lot Creeper" constitutes
10 harassment of Mr. Justin Ray.

11
12
13 Dated:
14 Thursday, July 13th, 2023

15 Signed by
16 Todd Michael Schultz
17 (Plaintiff)